

## **REMARKS**

This is in response to the Office Action dated April 30, 2004. Claims 1-24 are pending in the application. Claims 1-25 have been rejected. Claims 1, 10, and 24 have been amended, and new claims 25-51 have been added. Applicant traverses the rejections.

### ***Examiner's Interview***

Applicant's representative would like to thank Examiner Pierre-Michel Bataille for the courtesies extended to Applicant's representative, John V. Biernacki, during the telephone interview on July 22, 2004. During the interview, the Rudland reference (US 2002/0062417) was discussed in relation to claim 1's handling of proxies. Also, claims 9 and 10's handling of proxy elections was discussed in relation to the Rudland reference and the Daniels-Barnes reference (USPN 6,665,705). The remarks and the amendments contained herein further summarize the interview.

### ***Claim Rejections***

Claim 1 recites modules operating on a first machine wherein one of the modules assumes the role of a proxy. The proxy is responsible for messages involving another module operating on the first machine. On a second machine, modules are operating wherein one of the modules assumes the role of a proxy. The proxy handles messages for another module operating on the second machine.

The Office Action maintains that the Rudland reference (US 2002/0062417) anticipates claim 1. The Rudland reference discloses a bridging system for interoperation

of remote groups of devices. In Rudland, a first gateway is operative to communicate details of available devices on its respective bus to another gateway; the other gateway is operative to generate at least one proxy element corresponding to each of the available devices (see Abstract of the Rudland reference). The generated proxy elements reside on the gateway device and handle messages for software functional control modules (FCMs) that operate on different devices. This is illustrated in paragraph 35 of the Rudland reference:

[G]ateway devices in the present invention are implemented to generate and offer proxy FCMs to devices in the cluster in which they reside. The proxy FCMs correspond to FCMs of devices available in the cluster in which the gateway communicates with. For example, the intelligent TV 120 would be offered proxy FCMs 107a-107e enabling control of the VCR 130 and camcorder 150 in another room and the central heating system 140 of the house. The proxy FCMs correspond to real FCMs 151, 152, 131, 132 and 141 respectively. Proxy FCMs operate primarily as message forwarders, receiving messages addressed to the device that they are representing and repeating the same message verbatim to the opposite bus via the corresponding gateway device. In the above example, the VCR 130 and camcorder 150 will have proxy FCMs in gateway devices 107 and 113 whilst the central heating system 140 will have proxy FCMs in gateway devices 112 and 107.

Figure 3 depicts this configuration of proxies (e.g., 107a-107e) residing on gateway device 107 which handle messaging for software FCMs residing on different devices (e.g., intelligent TV 120). This configuration is significantly different than what is recited in claim 1. Claim 1 requires, in combination with its other limitations, that the module operating as a proxy on the first machine is responsible for messages involving another module that is also operating on the first machine. Because the Rudland reference does not disclose such limitations of claim 1, claim 1 as well as its dependent claims are allowable.

Claim 24 recites modules operating on a first machine wherein one of the modules assumes the role of a proxy. The proxy is responsible for messages involving another module operating on the first machine. On a second machine, modules are operating wherein one of the modules assumes the role of a proxy. The proxy handles messages related to another module operating on the second machine. Because the Rudland reference does not disclose such limitations of claim 24, claim 24 as well as its dependent claims are allowable.

Applicant disagrees with other positions in the office action. For example, claim 10 recites a proxy election scheme. The proxy election scheme of claim 10 is significantly different than what is disclosed in the Daniels-Barnes reference whether considered alone or in combination with the Rudland reference. As an illustration, claim 10 recites a proxy election scheme wherein only a single proxy is elected for a group of modules. The modules elect only a single proxy and does not have to rely upon a primary and secondary proxy election scheme as disclosed in the Daniels-Barnes reference and/or Rudland reference. Because the Rudland reference does not disclose such limitations of claim 10, claim 10 is allowable.

**CONCLUSION**

For the foregoing reasons, Applicants respectfully submit that claims 1-51 are allowable. Therefore, the Examiner is respectfully requested to pass this case to issuance.

Respectfully submitted,

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